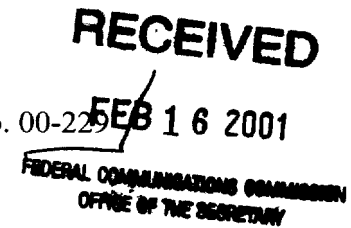


Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

In the Matter of )  
 )  
 2000 Biennial Regulatory Review -- )  
 Telecommunications Service Quality )  
 Reporting Requirements )

CC Docket No. 00-229



**REPLY COMMENTS OF SBC COMMUNICATIONS INC.**

SBC Communications Inc. (SBC) files these brief reply comments to reiterate its support for the Commission's efforts to streamline its existing service quality monitoring program.

Several parties in this proceeding argue that existing service quality reporting requirements, although outdated, should be retained. Others argue that streamlining the program is premature, despite a mandate under the Telecommunications Act of 1996 (Act)<sup>1</sup> to do so. SBC urges the Commission to ignore those parties who clearly want to use regulation for the sole reason of burdening their competitors. In its Notice of Proposed Rulemaking (NPRM), the Commission has wisely initiated reform that is needed and is consistent with the deregulatory nature of the Act. SBC supports the Commission in seeing that reform through to fruition.

The Commission desires to put into place a monitoring program that is simple. SBC embraces that suggestion wholeheartedly. In fact, simplicity is one essential characteristic of any monitoring plan that has utility for purchasers of telecommunications services. To maximize utility, elements of a monitoring plan must be of interest to consumers, that is, be elements that actually affect their buying decisions,

<sup>1</sup> Pub. L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. § 151 *et seq.* Indeed, Section 11(b) of the Act instructs the Commission during its biennial review of regulations to "repeal or modify any regulation it determines to be no longer necessary..."

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and be easily understood. Of course, utility to consumers also requires that there be data available by which consumers can compare the results of one provider to others, in much the same way as consumers compare airlines' "on time arrival" performance. Excessive reporting categories, on the other hand, are simply superfluous. They do not provide consumers with added information of value but do impose a costly burden on carriers. Accordingly, all but the most basic reporting categories should be eliminated.

Foremost in this effort toward simplification is the need to eliminate the reporting of highly technical information. Among those excessive reporting requirements that should be discarded are ARMIS Reports 43-05 and 43-06. The many categories contained in those reports (over 30), much of them highly technical, are essentially useless to consumers. Their inclusion in the Commission's monitoring program again imposes a burden with no benefit. As such, they should no longer be required.

Absent refinement and definition, the NARUC White Paper is not a good substitute for the Commission's current reporting program.<sup>2</sup> For example, it assumes that carriers already gather the required data for internal business purposes or for reporting to the states. In reality, most carriers and states aggregate the information differently. As a result, reporting under the NARUC White Paper may require significant programming efforts and costs for many carriers. In addition, there is a need for definition and clarity of many of the operative terms employed by the NARUC White Paper in order to assure uniformity and efficiency in reporting. SBC is willing to engage with the Commission and the rest of the industry in an effort to use the NARUC White Paper as a template

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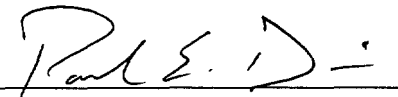
<sup>2</sup> Pursuant to the SBC/Ameritech Merger Conditions SBC files quarterly service quality reports based on the NARUC White Paper. *See Applications of Ameritech Corp. and SBC Communications Inc. for Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Section 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95, and 101 of the Commission's Rules, CC Docket No. 98-141, Memorandum Opinion and Order, 14 FCC Rcd 14712 (1999).*

from which to model a monitoring program that meets the goals stated in the NPRM and is of substantial utility to consumers.

The Commission is in a unique position to implement a monitoring program in a manner that is drastically simpler yet more effective than that which currently exists. The NPRM indicates that it is prepared to do so.<sup>3</sup> Reform implemented by the Commission in this proceeding could eliminate the truly anachronistic reporting scheme in place today and replace it with a boldly simple mechanism applied to all carriers—one that simultaneously provides consumers with succinct and valuable information necessary to choose telecommunications providers. SBC stands behind the Commission in this effort.

Respectfully Submitted,

SBC COMMUNICATIONS INC.

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February 16, 2001

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<sup>3</sup> The Commission might consider involving in a more direct fashion the thoughts of residence and business consumers with respect to elements of service that are apt to affect their buying decisions. Such an effort might include open forums and/or focus groups designed to identify those few key elements that are of most importance and utility.

# CERTIFICATE OF SERVICE

I, Regina Ragucci, hereby certify that a true and correct copy of the foregoing Reply Comments of SBC Communications was on this 16<sup>th</sup> day of February 2001, was served by first class, U.S. mail, postage prepaid, to the following parties:



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